

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

I/P ENGINE, INC.,

Plaintiff,

v.

Civil Action No. 2:11cv512 (RAJ-FBS)

AOL INC., GOOGLE, INC.,
IAC SEARCH & MEDIA, INC.,
GANNETT CO., INC. and
TARGET CORPORATION

Defendants.

**MOTION FOR EXTENSION OF TIME FOR GANNETT CO., INC.
TO FILE RESPONSIVE PLEADINGS TO COMPLAINT**

The defendant Gannett Co., Inc. (“Gannett”), by counsel, moves this Court for an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint filed by I/P Engine, Inc. (“I/P Engine”), and in support thereof states as follows:

1. On September 15, 2011, I/P Engine filed its Complaint for patent infringement against Gannett. On September 23, 2011, I/P Engine served its Complaint upon Gannett.
2. Gannett’s responsive pleadings are not due until October 14, 2011.
3. Gannett has requested and I/P Engine has agreed to allow Gannett an extension of time through November 14, 2011, for Gannett to answer, plead, or otherwise respond to the Complaint filed by I/P Engine.
4. Attached as **Exhibit A** is a proposed agreed order granting Gannett an extension of time through November 14, 2011, to answer, plead or otherwise respond to the Complaint

filed by I/P Engine. The proposed agreed order is being circulated for endorsement and will be delivered to the Court once it is fully signed.

WHEREFORE, Gannett, by counsel, requests that this Court enter the attached proposed agreed order granting Gannett an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint.

Dated: October 4, 2011

Respectfully submitted,

/s/ Stephen E. Noona
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Counsel for Gannett Co., Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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